EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION THIS DOCUMENT RELATES TO: *The County of Summit, Ohio*, et al. *v. Purdue Pharma L.P.*, et al. Case No. 18-op-45090 *The County of Cuyahoga, Ohio*, et al. *v. Purdue Pharma L.P.*, et al. Case No. 1:18-op-45004 Track One-B	MDL No. 2804 Case No. 17-md-2804 Judge Dan Aaron Polster

DECLARATION OF WILLIAM F. BOYD

I, William F. Boyd, hereby declare as follows:

1.   I hold the position of IT Director, Pharmacy Data Warehouse, for CVS Pharmacy, Inc. ("CVS"). I have held this position for approximately 11 years. I have been working in CVS's Pharmacy Data Warehouse for approximately 23 years in all. In my current position, I oversee the team responsible for loading and maintaining all of CVS's retail pharmacy data and, where appropriate, for satisfying requests for such data.

2.   As disclosed in its most recent annual report, CVS has approximately 9,900 retail pharmacies. The Pharmacy Data Warehouse contains data on well over 10 billion prescription fills, including numerous data fields for each.

3.   CVS currently has approximately 82 stores in Cuyahoga and Summit counties. In 2018, CVS pharmacies filled more than 7.25 million prescriptions in these two counties.

4.   CVS's prescription-level data contains sensitive personal health information of our patients. Such information is subject to HIPAA and other privacy laws.

5.   While there is uncertainty in estimating the amount of time needed for a massive transfer of data, and while the data fields subject to production have not been set, we estimate that it would take approximately 6 to 9 months in total, if not longer, to produce prescription data on a nationwide basis. This assumes the data fields are limited to basic prescription information and are not changed midstream. We not only would require the assistance of an outside vendor in this process, but we estimate that, internally, we would need to devote more than 2 full-time workers to the task of extracting the data for several months.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December 18 2019.

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William F. Boyd